



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*Jacob K. Javits Federal Building  
26 Federal Plaza, 37<sup>th</sup> Floor  
New York, New York 10278*

April 12, 2024

**VIA ECF**

The Honorable Sidney H. Stein  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Ying Sun, et al*  
Case No. 21-CR-343 (SHS)

Dear Judge Stein:

Pursuant to Local Civil Rule 5.2(b) and this Court's Individual Practice Rule 1.E, the Government hereby moves the Court for an extension of time to April 24, 2024 to file its reply to Petitioner's Opposition to the Government's Motion to Dismiss Petitioners' First Amended Petition ("Petitioners' Opposition") (Dkt. 309). Petitioners' Opposition was filed on April 10, 2024, and pursuant to Local Civil Rule 6.1(b), the Government is permitted seven days to file and serve its reply. Therefore, the Government's reply is currently due April 17, 2024.

The Government has not previously requested an extension of time to file its reply. Furthermore, the Government has consulted with the Petitioners, who have consented to a seven-day extension for the Government to reply. This extension of time would not affect any other scheduled dates before the Court. Therefore, the Government respectfully requests that the Court enter an Order granting the Government until April 24, 2024 to file its reply to Petitioners' Opposition.

Respectfully submitted,

DAMIAN WILLIAMS  
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by: /s/  
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cc: All counsel of record (by ECF)